

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Cassidy Marie Catherine Thomas,

Debtor.

Case No. 22-13131-mdc

Chapter 13

Debtor's Motion to Modify Chapter 13 Plan

AND NOW, Debtor Cassidy Marie Catherine Thomas, by and through her attorney, moves this Court for approval of a modified chapter 13 plan. In support of this motion, the Debtor states as follows:

1. The Debtor filed this case under chapter 13 on November 22, 2022.
2. The plan was confirmed on March 1, 2023.
3. The Debtor hereby requests that the Second Amended Chapter 13 Plan filed as ECF No. 32 be approved by the court and adopted as the confirmed chapter 13 plan.
4. The proposed plan: (i) cures an arrearage of plan payments by increasing the monthly payment amount, and (ii) provides for payment of attorney fees to the Debtor's counsel for post-confirmation services.

NOW, THEREFORE, the Debtor asks this Court to approve the modified plan and to grant such other relief in her favor as may be necessary and proper under the law.

Date: November 29, 2023

CIBIK LAW, P.C.
Counsel for Debtor

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